DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Mid-Atlantic Region

Food and Drug Administration
Waterview Corporate Center
10 Waterview Blvd., 3rd Floor
Parsippany, NJ 07054

Telephone (201) 331-2904

June 13, 1997

**WARNING LETTER**

**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**
J. Stephen Duerr, President
Metuchen Analytical, Inc.
25 Mack Drive
Edison, New Jersey 08817

RELEASE
REVIEWED BY C.O. 6/17/97 DATE

**FILE NO.: 97-NWJ-40**

Dear Mr. Duerr:

An inspection was conducted of your testing laboratory located at 25 Mack Drive, Edison, New Jersey, by the U.S. Food and Drug Administration on April 7 - 25, 1997. The inspection revealed significant deviations from current good manufacturing practices (21 CFR 210/211) concerning the performance of analyses, lack of validation of testing methods, and lack of following written procedures relating to analytical methodology. The violations were presented to your attention on a FD-483 List of Observations, at the close of the inspection. These CGMP deviations cause articles of drug assayed for release for further manufacture and/or release for commercial distribution to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act, in that the methods used in and the controls used for the manufacturing, processing, and holding of drug products are not in conformance with current GMP regulations part 210 and 211.

The significant CGMP deviations noted are as follows:

Chemistry

1. The firm did not report failing results obtained during analytical testing to their customers. Also, analytical methods were modified after out of specification results were obtained. Samples were tested with modified methods and the in-specification results from the modified methods were reported to customers. For example:

A. Multiple results for percent water content were obtained for Propylene Glycol USP lot ERM [redacted] from [redacted]. The percent water content specification for Propylene Glycol is NMT 0.2%. Results of 0.467, 0.280, 0.18 (in-specification), 0.446 and 0.327% were obtained. The Laboratory Report supplied to the customer showed that none of these water content results were reported. The sample was re-tested repeatedly because the analytical methods were modified after each out of specification result was obtained.

B. During the testing of Polyethylene Glycol NF lot [redacted] from [redacted]., out of specification results of 4.2 and 4.0 were obtained for pH, initially and on a re-test. The specification was 4.5-7.5. The investigation stated that the out of specification results would be reported to the customer. pH testing was again performed for this lot and in-specification results of 4.53 were obtained. These results were reported to the customer. No explanation could be provided as to why the initial results were not reported to the customer, as specified in the out of specification report.

2. Failure to reject sample results obtained using inappropriate data, missing data, and unverified test methodology. Examples:

A. HPLC testing was performed for Excedrin Caplets (Acetaminophen, Caffeine, Aspirin) lot [redacted], [redacted] for percent assay and content uniformity. The samples were tested and system suitability requirements were not met. Three of the standard peaks (Caffeine, Aspirin, Benzoic Acid) were fused together. No acceptable system suitability chromatography was available for review.

B. During the HPLC assay testing of Pro Clearz (Tolnaftate Topical Solution USP) lot [redacted] the baseline offset on the chromatograms was too low. The entire standard and sample peak areas were incomplete. In-specification results were reported to the customer. The chromatograms and notebooks were approved and signed by the supervisor.

C. Two out of the seven system suitability chromatograms for the HPLC assay testing of Pro Clearz lot [redacted] could not be located. The lab notebook and chromatograms were both reviewed and signed as acceptable by the supervisor.

3. There were no documented errors to support the re-testing and invalidation of results that occurred. For example:

A. During the assay testing of an Acetaminophen blend composite samples lots [redacted] and [redacted] out of specification initial and re-test values were invalidated based on an undocumented sample preparation error. Blend specifications are 88-92%. The initial test results were 75.6, 72.9, and 73.8%. New standard solutions were prepared and the test sample solutions were tested again. The results were 87.4, 83.2, and 85.0%. These out of specification results were invalidated. New test sample solutions were made in-specification results of 88.6, 88.9, and 88.1% were obtained and reported to the customer.

4. The firm did not met equipment calibration requirements and/or follow equipment calibration procedures. For example:

A. During the monthly calibration (10/96) of HPLC system #2 the %RSD requirement of peak height was not met. There was no written investigation into why the calibration requirement was not met nor were any corrective actions made.

HPLC system #1 was not calibrated in 9/96 or 10/96 and HPLC system #2 was not calibrated in 9/96.

5. Lack of validation data to support the adequacy of the computer software (PC1000 version 2.5 supplied by [redacted] used to run the HPLC systems.

Microbiology

6. Lack of validation data to show that the microbial test methods used for Depron Syrup (Acetaminophen) lot #5E1500, Tempra Drops (Acetaminophen) lot [redacted] Bufferin Tablets lot [redacted] and Acetaminophen Blends lot [redacted] and lot [redacted] were capable of detecting microorganisms present.

We have received your response letter dated May 15, 1997. We have reviewed the letter and consider your proposed corrective actions to be adequate. We will confirm the adequacy of your corrections during our next FDA inspection. However, it is your responsibility to ensure that all requirements of the Federal Food, Drug, and Cosmetic Act and regulations promulgated thereunder are being met. We recommend that you conduct a complete evaluation of your facility for CGMP compliance.

The above list of violations are not to be considered as an all-inclusive list of the violations at your facility. In addition, until adequate corrective actions have been taken the Food and Drug Administration will not approve NDA's, ANDA's and/or requests for evaluation by government procurement agencies which your firm may have pending involving drug products.

You should take prompt action to correct these deviations. Failure to promptly correct these deviations may result in regulatory action without further notice. This includes seizure and/or injunction.

Any additional information you may wish to submit regarding this matter or any question you may have should be directed to the Food and Drug Administration, New Jersey District Office, 10 Waterview Blvd, 3rd Floor, Parsippany, New Jersey 07054, Attention: Andrew Ciaccia, Compliance Officer.

Very truly yours,

Ray Abrahams

Ray H. Abrahams
Acting District Director
New Jersey District Office

AC:slw